

TJK/QM-19-101

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

LAURIE BIRTELL, as Independent)	
Administrator of the Estate of)	
JOHN BIRTELL, Deceased,)	
)	
Plaintiff,)	
v.)	Case No.: 3:21-cv-50136
)	
UNITED STATES OF AMERICA,)	Honorable Ian D. Johnston
)	
Defendant.)	Magistrate Judge Margaret J. Schneider

PETITION FOR ATTORNEYS' FEES

NOW COMES the Petitioner, GWC Injury Lawyers, LLC (hereinafter referred to as "GWC"), former attorneys for John Birtell, (hereinafter referred to as "Client") and in support of GWC's Petition for Attorneys' Fees against Client, states as follows:

1. On or about March 31, 2019, GWC was retained by Client to represent him in the above captioned matter on a contingency fee basis.
2. On or about November 4, 2019, Client discharged GWC as his attorney and retained O'Connor Law Firm, Ltd.
3. The above captioned matter is a motor vehicle head on collision involving the Client and a U.S. Department of Justice employee, Anita Kasza.
4. During the period of representation, GWC spent considerable time conducting initial investigation into the occurrence, drafting letters and correspondences, and reviewing medical records, bills and insurance policies.
5. The above captioned matter is pending before this Honorable Court and has not been resolved.

6. To date, O'Connor Law Firm has paid GWC's expenses associated with this file. GWC files this Petition to reserve its right to collect Quantum Meruit fees at the resolution of this matter.

7. The legal services GWC performed on Client's behalf were necessary and requisite for effective representation of Client.

WHEREFORE, GWC Injury Lawyers, LLC, respectfully request this Honorable Court to enter an Order granting the following:

- A. That Laurie Birtell, as Independent Administrator of the Estate of John Birtell, deceased and her attorneys, O'Connor Law Firm, notify GWC upon the resolution of the above captioned matter and before distribution of any settlement or verdict proceeds;
- B. That GWC's Petition for Attorneys' Fees be entered and continued until the resolution of the above captioned matter, at which time a detailed Petition will be submitted disclosing GWC's activities and time representing Client;
- C. That any Dismissal Order expressly state this Honorable Court retains jurisdiction to adjudicate GWC's Petition for Fees; and
- D. Any other relief as this Honorable Court deems appropriate.

GWC INJURY LAWYERS LLC

/s/ Timothy J. Keiser
One of Petitioner's Attorneys

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